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April 11, 2023

Via ECF & Electronic Mail

Hon. J. Lorna G. Schofield United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: Coleman v. 26 Motor Corp., et al.

Case No. 1:21-CV-10537

Dear Judge Schofield,

Further to my March 31, 2023, correspondence to Your Honor, last Thursday evening Plaintiff's counsel conveyed a new settlement demand followed by Defendants countering with a new settlement offer. To date, Plaintiff's counsel has not responded to Defendant's offer.

Yesterday, April 10, 2023, I emailed a Plaintiff's counsel a proposed a joint letter to Your Honor advising of the current status of negotiation. I have not received a response to same.

Accordingly, active settlement negotiations continue in this matter. On behalf of Defendants I am optimistic that shortly this case will either settle outright or that the parties will enter mediation on mutually agreed terms and that this case will not require a return to Your Honor's docket.

Thank you for your consideration of this matter and I will report any new developments.

Very truly yours,

H. Nicholas Goodman

cc: Cooper Ellenberg (via ECF) Daniel Schlanger (via ECF)